Summary of the Accreditation Process Committee Meeting July 29, 1997

The Accreditation Process Committee of the National Environmental Laboratory Accreditation Conference (NELAC) convened on Tuesday July 29, 1997 at 12:30 P.M. The meeting was led by its chair, Ms. Margaret M. Prevost, of the New York State Dept. of Health. A list of the committee members is given in Attachment A. Twenty-three people were in the audience.

Introduction

The purpose of this meeting is two fold. The first purpose is to adopt standards that were not voted on at the last meeting. The second purpose is to accept changes in sections that were voted on and accepted at the last meeting but have been amended. Comments received recently from EMMC Laboratory Accreditation Panel and Department of Defense (DOD) will also be discussed.

Sections not voted upon/adopted at the July, 1996 conference

Several items were clarified in the standards by the committee, these modifications were discussed and accepted.

4.1.1 Personnel Qualifications: It was suggested that wastewater treatment operators and small dischargers will have problems meeting personnel requirements for accreditation. In response to this question the committee proposed that for these facilities, the accrediting authority would have more latitude.

It was suggested that persons measuring radon should have a 4 year degree not an associates degree. Response: Since so many machines are completely automated experience seems to be more important than a BS degree. The committee looked at other programs and used their qualifications for setting their standard. The committee felt that the wording used in section 4.1.1.f was appropriate.

- 4.1.2 On site Assessments: These sections may have to be redone once the Performance Testing sections are voted on. Sections 4.1.2 is a summary of the Performance Testing chapter and the On Site Assessment chapter. These chapters are coming up for vote any changes that are made in these chapters will be reflected in next years standards.
- 4.1.4 Proficiency Testing Samples: No comments.
- 4.5.1 Interim Accreditation: No comments.
- 4.5.2 Revocation of Interim Accreditation: No comments.

The following sections were previously voted upon and adopted but have been amended:

4.1.3 Corrective Action Reports: These sections have been streamlined and some changes made since last meeting. One discrepancy between this chapter and other chapters is the term 30

working days versus 30 days. This committee agreed that it should be 30 working days.

- 4.3.1 Quality Systems: This is a summary of the Quality Systems chapter. The committee has taken out some of the detail so that changes will not have to be made when Chapter 5 is voted on and modified.
- 4.4.1 Denial: Items were clarified where they did not read well.
- 4.4.2 Suspension: No comments.
- 4.4.3 Revocation: 4.4.3 D It is indefinite when the 6-month period starts. The terminology was changed to read 6 months from the date of revocation. It was discussed to place the terminology from the date the laboratory received the notification. This was discussed and was thought to be a problem because it would be hard to determine the date that the laboratory received the notification

It was suggested that the 6-month waiting period to reapply may be unfair for those laboratories that did not submit their fees on time. In response, it is difficult to run a program without funds. Laboratories would not be immediately dropped because they are late on the payment of funds. The laboratory would be notified and given an extension if the laboratory does not pay. After notification the laboratory's accreditation would be revoked. The terminology is such that each state will have latitude with their decision on this item.

The floor was open to comments on mobile laboratories. The question was raised on whether mobile labs should be accredited as a part of their home laboratory or separately. As the standard is written, it is proposed that each mobile laboratory be accredited by the state. The memo from the EMMC suggests that all mobile laboratories be accredited in conjunction with their home laboratories. This will be a problem because mobile laboratories are not always in a location where they can be inspected by the accrediting authority. The Chair asked that written comments concerning mobile laboratories be sent to her. The comments will be compiled and discussed at the interim meeting.

Several issues relating to mobile laboratories are listed below:

- 1. Definition of field measurement or a mobile laboratory
- 2. Length of time the laboratory will be at a location
- 3. Purpose of analysis to be performed, use of results to make major decisions or perform remediation.
- 4. If there are problems with locating and inspecting these mobile laboratories, one solution would have the mobile laboratory transported to the accrediting authority.
- 5. Status of home inspectors who do radon or lead tests in regards to definition of mobile laboratories

The floor was opened to comments concerning revocation of a laboratory's accreditation by a primary accrediting authority. If the laboratory's accreditation is revoked by the primary authority for not paying fees, would other states also revoke their accreditation? There was discussion on

this question and no decision was reached. One state representative said they would revoke accreditation if the primary authority revoked accreditation. Another state said an appeal process would be used.

The question was raised concerning accrediation of multiple locations of a laboratory within a city, state and several states. If the laboratories are within the same city and are under the direction of the same director who oversees quality assurance they are considered one laboratory. If the laboratory is not within the same city they currently would be considered two laboratories. The primary accrediting authority will have the final determination on whether two or more locations will be considered as one laboratory.

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